

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNIVERSITAS EDUCATION, LLC,

Plaintiff,

v.

NOVA GROUP, INC. et al.,

Defendants.

Case Nos. 11-1590-LTS and
11-8726-LTS

**NOTICE OF MOTION FOR THE IMPOSITION OF RULE 11 SANCTIONS AGAINST
ROGER STAVIS, ESQ. AND MINTZ & GOLD LLP**

PLEASE TAKE NOTICE that, upon the supporting Memorandum of Law and exhibits attached thereto, Plaintiff Universitas Education, LLC (“Universitas”) hereby moves this Court, pursuant to Rule 11 of the Federal Rules of Civil Procedure, for sanctions against Roger Stavis and Mintz & Gold LLP in response to the motion(s) to vacate the judgment filed by Grist Mill Capital, LLC (“GMC”). Universitas respectfully requests the following sanctions:

1. Sanction Mr. Stavis in the amount of the total legal fees received for the representation of GMC in this matter
2. Require Mr. Stavis to pay Universitas’ attorneys’ fees for responding to GMC’s motion(s) to vacate and the related motion for sanctions
3. Hold Mintz & Gold LLP jointly liable for the sanctions against Mr. Stavis since other Mintz & Gold lawyers have participated in this matter

Universitas, through its undersigned counsel, certifies that pursuant to the Court’s Individual Practices Rules it has used its best efforts to informally resolve the matters raised in this motion.

Dated: Alexandria, VA
March 23, 2021

PLAINTIFF UNIVERSITAS EDUCATION, LLC

By: /s/ Joseph L. Manson III /

Joseph L. Manson III

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Admitted Pro Hac Vice

CERTIFICATION

I hereby certify that on March 23, 2021 a copy of the foregoing motion was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Joseph L. Manson III